

***Remarks***

Reconsideration of this application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-3, 5-21, 23-42, and 44-63 are pending in the application, with claims 1, 23, and 44 being the independent claims.

Claims 4, 22, and 43 are sought to be cancelled.

Based on the following Remarks, Applicant respectfully requests that the Examiner consider all outstanding rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 103***

The Examiner argues that claim 1 is unpatentable over U.S. Patent 6,154,215 to Hopcroft ("Hopcroft"). In particular, the Examiner argues that Hopcroft discloses the optimization manager feature of claim 1, i.e., "an optimization manager for creating, configuring, and applying an optimization process to an input scene graph, wherein said optimization process comprises logic for an atomic optimization." The Examiner argues that this limitation is disclosed in FIG. 12 of Hopcroft. Hopcroft, however, does not disclose an optimization manager that creates and configures an optimization process. Rather, Hopcroft only discloses the logic of an optimization process. Nowhere does Hopcroft disclose creating an optimization process or configuring an optimization process. Moreover, nowhere does Hopcroft either disclose or suggest an optimization manager entity that performs these actions.

The Examiner goes on to argue that Hopcroft discloses the optimization

configuration manager limitation of claim 1, i.e., "an optimization configuration manager for accepting user configuration information to said optimization process." User configuration information can include, for example, the selection of one or more specific atomic optimizations (specification, paragraph 0030). Claim 1 has been amended so that the user configuration information includes selection of one or more of the atomic optimizations. Such a selection is neither disclosed nor suggested by Hopcroft.

For at least these reasons, therefore, Hopcroft neither discloses nor suggests all the features of claim 1 as amended. This claim is therefore patentable over Hopcroft.

Claims 2, 3, and 5-21 depend from claim 1, and therefore incorporate the features of claim 1. Because Hopcroft fails to disclose or suggest all features of claim 1, claims 2, 3, and 5-21 are likewise patentable over Hopcroft for at least the reasons specified above.

With respect to claim 23, the Examiner applies the same arguments made with respect to claim 1. Claim 23, as amended, includes the step of receiving user input identifying an atomic optimization and any associated parameters. Such user input is not disclosed or suggested anywhere in Hopcroft. For at least this reason, this claim is patentable over Hopcroft.

Claims 24-42 depend from claim 23, and therefore include the features of claim 23. Because Hopcroft does not disclose or suggest all the steps of claim 23, claims 24-42 are likewise patentable over Hopcroft.

In his rejection of claim 44, the Examiner relies on the same reasoning that was

applied in rejecting claim 23. Claim 44, as amended, includes computer-readable program code means for causing the computer to receive user input identifying an atomic optimization and associated parameters. As discussed above, Hopcroft nowhere discloses or suggests such user input. Hence, Hopcroft fails to disclose or suggest all limitations of claim 44 as amended. For at least this reason, therefore, claim 44 is patentable over Hopcroft.

Because claims 45-63 depend on claim 44, these dependent claims necessarily incorporate all the features of claim 44 as amended. For the reasons described above with respect to claim 44, Hopcroft fails to disclose or suggest all the features of each of claims 45-63. These claims are therefore patentable over Hopcroft.

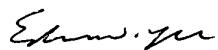
***Conclusion***

All the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicant believes that a full and complete Reply has been made to the outstanding Office Action and, as such, the present Application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this Application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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